Response to TCEQ comments on the Equipment Decon Plan (Enterprise Site) 04.15.2019

General Comments

• Any recovered materials are assumed to be hazardous waste until a determination has been made in accordance with 30 Texas Administrative Code (TAC) 335 Subchapter R and should be managed as such. Until the Waste Management Plan is approved by the UC, all wastes generated during this incident are being handled and transported to the ITC facility for storage in accordance with the immediate response exemption and the draft Waste Management Plan. Determination and characterization of wastes generated during this emergency response is detailed in the Waste Management Plan.

- Until waste characterizations are made, all recovered materials are assumed to be hazardous waste.

• Define all acronyms, or provide a glossary

Definitions added to acronyms

- Ensure that all acronyms are being defined (e.g., MSRC in the Preface and OSRV on page 4)

• Clarify what procedures will be used for collecting wipe samples, what frequency will be specified (i.e. one per X sq feet of surface area), what wipe samples will test for, and what criteria they will be compared to in order to determine whether decontamination is complete. TCEQ recommends collecting rinsate samples off of the equipment and compare test results to TRRP Tier 1 drinking water PCLs. Wipe samples are not collected. A wipe test is conducted, which involves wiping sorbent material or a rag to confirm that no transferabel material remains. Clarified in the plan.

- Provide additional clarification on the standards which would demonstrate equipment contacted with hazardous substances is appropriately decontaminated. The demonstration would include comments above.

Section 8.3

• Refrain from referencing recovered waste or decon generated waste as “recovered material” or “material”. Released material, recovered material is the terminology that has been accepted by the Unified Command.

- See original comment

Section 11.

• • Revise to address the generation of waste and compliance with TCEQ and EPA rules or regulations concerning packaging, labeling, marking, placarding, accumulation time, and recordkeeping requirements. Waste handling is conducted in accordance with the draft Waste Management Plan - this is repeated throughout the document.

• Ensure that Waste Management Plan addresses wastes generated from decon

Section 12.

• • Equipment owners should be given copy of any relevant analytical results demonstrating decontamination. analytical results are not anticipated – visual inspection and wipe test only.

• This draft does not include the Certification of Decontamination Form

Section 14.

• Edit citation to reflect 29 CFR 1910.120 – Hazardous Waste Operations and Emergency Response (HAZWOPER) edited

• Fix typo in citation to reflect “29 CFR 1910.120 Hazardous Waste Operations and Emergency Response (HAZWOPER)” and “33 CFR 1910.146”

Section 16.

- • Clarify if the final soil analytical results do exceed background, the release will be subject to TRRP. Clarified
- Replace “baseline” with “background”
- Remove last sentence: “Any signs of contamination from..”

**Decon Site Sampling Plan**

Section 3

• Revise the plan to include TPH and any other constituents identified in samples elsewhere. As previously discussed with Nicole Weist, TPH was not considered since the BTEX and PAHs will be indicative of any TPH. In addition, the samples have already been collected prior to lining of the site, to prevent any delay of decontamination of response equipment. However, a note has been added that TPH will be quantified if sample volumes allow.

- The plan should include TPH as this method is applicable to soil, groundwater and waste. Analytical data described in 30 TAC 25.4 must be generated by a lab that is accredited through the Texas Lab Accreditation Program under NELAP standard for matrices, methods and parameters of analyses.

• Table 3.D.3-1: Provide logic for the soil samples on the selected analytes chosen (i.e., PAH vs TPH). Parameters are based on the knowledge gained in the field over the past weeks, including the components identified in outfall 002.

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